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SEP 17 2008

Federal Communications Commission  
Office of the Secretary

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September 17, 2008

By Hand

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Epana Networks, Inc., Quarterly PIU Report for 2nd Quarter  
2008, WC Docket No. 05-68

Dear Secretary Dortch:

On behalf of Epana Networks, Inc. ("Epana"), please find attached a redacted, public version and a confidential version of the Officer Certification required in WC Docket No. 05-68 for the 2nd Quarter of 2008.

Epana, by its counsel and pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457, 0.459 (1994), hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. This Certification contains information regarding Epana's calling card traffic patterns and revenue information that would not otherwise be available to the public. Due to the confidential nature of such information, Epana hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. Accordingly, the attached Certification of Epana has been marked "**CONFIDENTIAL - NOT FOR PUBLIC INSPECTION.**" Epana provides justification for the confidential treatment of this information in Attachment 1 to this letter. Epana is also submitting, under separate cover, for inclusion in the Commission's public files, a redacted version of this Certification. The redacted version is marked "**REDACTED - FOR PUBLIC INSPECTION,**" with the confidential information redacted.

For both versions of this filing, Epana is providing an original and four copies and, for both versions, an extra copy of each to be stamped and returned to the courier.

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Should you have any questions concerning this filing, or the request for confidentiality, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Katie Besha", with a stylized flourish at the end.

Katie B. Besha

cc: Chief, Pricing Policy Division, Wireline Competition Bureau, Federal  
Communications Commission  
Best Copy and Printing, Inc. (fcc@bpciweb.com)

## ATTACHMENT 1

### **Confidentiality Justification**

Epana requests confidential treatment of the information being provided in its Pre-Paid Calling Card Provider FCC Quarterly Certification ("Certification") because this information is competitively sensitive and its disclosure would have a negative competitive impact on Epana were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§0.457 and 0.459.

#### 47 C.F.R. §0.457

Specific information in the Certification is confidential and proprietary to Epana as "trade secrets and commercial or financial information" under Section 47 C.F.R. §0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with Epana's ongoing business and operations.

#### 47 C.F.R. §0.459

Specific information in the Certification is also subject to protection under 47 C.F.R. §0.459, as demonstrated below.

#### Information for which confidential treatment is sought

Epana requests that specific information in the Certification, marked as "[REDACTED]" be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential is information regarding Epana's percentage of intrastate, interstate and international calling card minutes. This information is competitively sensitive information that Epana maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on Epana since it would provide competitors with commercially sensitive information. The non-redacted version of Epana's filing is marked as "**CONFIDENTIAL - NOT FOR PUBLIC INSPECTION.**"

#### Commission proceeding in which the information was submitted

The information is being submitted as Epana's Pre-Paid Calling Provider FCC Quarterly Certification in WC Docket No. 05-68.

#### Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information designated as confidential is information regarding Epana's percentage of intrastate, interstate and international calling card minutes. As noted above, the data is competitively sensitive information which is not normally released to the public as such release would have a substantial negative competitive impact on Epana.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm

The release of this confidential and proprietary information would cause Epana competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of Epana's business.

Measures taken by Epana to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosures of the information to third parties

Epana has treated and continues to treat the non-public information disclosed in this Certification as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which Epana asserts that the material should not be available for public disclosure

Epana cannot determine at this time any date on which this information should not be considered confidential.

Other information Epana believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

REDACTED FOR PUBLIC INSPECTION

Pre-Paid Calling Card Provider FCC Quarterly Certification

WC Docket No. 05-68

CERTIFICATION OF EPANA NETWORKS, INC.

1. Pursuant to 47 C.F.R. § 64.5001(c), the undersigned hereby certifies that they are an officer of Epana Networks, Inc.; and that to the best of my knowledge, information or belief, all statements of fact contained in this certification are true and that said certification is an accurate statement of the data set forth herein for the reporting period of 2nd Quarter, 2008.
2. The following is the percentage of intrastate, interstate, and international calling card minutes for the above stated reporting period.
  - a. Percentage of intrastate calling card minutes: [REDACTED]
  - b. Percentage of interstate calling card minutes: [REDACTED]
  - c. Percentage of international calling card minutes: [REDACTED]
3. The percentage of total prepaid calling card service revenue (excluding revenue from prepaid calling cards sold by, to, or pursuant to contract with the Department of Defense (DoD) or a DoD entity) attributable to interstate and international calls for the reporting period is [REDACTED] percent.
4. Epana Networks, Inc. is contributing to the required Universal Service Fund based on the reported information, to the extent required by the applicable Commission regulations.
5. Epana Networks, Inc. has complied with the reporting requirements described in paragraph (a) of 47 C.F.R. § 64.5001, by providing the required reports to carriers from which transport services are purchased.

The foregoing certification is made under penalty of perjury of the laws of the State of New York on this, the 16<sup>th</sup> day of September 2008.

SIGNATURE \_\_\_\_\_

PRINTED NAME: Meryl Ravitz

POSITION: Controller/Treasurer